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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**GLACIER FILMS (USA) INC. and**  
**GLACIER FILMS 1 LLC,**  
*Plaintiffs*

*v.*

**Andrey TURCHIN,**  
*Defendant*

)  
) Civil Action No.: .....3:15-cv-01817-SB  
)  
) **DEFENDANT'S RULE 68 OFFER OF**  
) **JUDGMENT**

**PURSUANT to Rule 68** of the Federal Rules of Civil Procedure, Defendant Andrey TURCHIN offers to allow judgment on the following terms, with the costs then accrued to be dealt with as follows:

1. Plaintiffs may file this Offer and their notice of acceptance with the Court, and require that the clerk enter judgment against Defendant of liability for copyright infringement under 17 U.S.C. § 501 of the works registered as PA0001938638 and PAu003681371.

2. Upon such acceptance, filing and entry of judgment, Defendant will pay the sum of \$2,501<sup>00</sup> (two thousand, five hundred and one dollars and no cents) to Plaintiffs.

3. Plaintiffs' acceptance must explicitly state that the foregoing sum satisfies all debts and obligations, known or unknown, actual or potential, liquidated or unliquidated, that exist or may exist between the parties at the time of acceptance and which are related directly or indirectly to matters that were presented to the Court in the current action or could or should have been presented in the current action, including without limitation any claim by Plaintiffs or either of them to actual damages, statutory damages, costs or attorney fees from Defendant upon any basis or theory whatsoever.

This offer is valid and may be accepted within fourteen (14) days after service, in accordance with the Rule.

24 June 2016

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Date

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David H. Madden, SBN OR080396  
Attorney for Defendant Andrey TURCHIN  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the document entitled:

**DEFENDANT'S RULE 68 OFFER OF JUDGMENT**

was served upon the parties listed below on the date indicated,

- ☐ by following state law for serving a summons in an action brought in courts of general jurisdiction where the district court is located or where service is made;
- ☐ by delivery of a true copy of the document to the party to be served;
- ☐ by delivering a true copy of the document to the dwelling house or usual place of abode of the person to be served, to any person 14 years of age or older residing in the dwelling house or usual place of abode of the person to be served;
- ☐ by leaving a true copy of the document during working hours at an office maintained by the party to be served for the conduct of business, with the person who is apparently in charge;
- ☐ by mailing a true copy of the document to the party by first class mail and by any of the following: certified, registered, or express mail with return receipt requested;
- ☐ by delivering a copy of the document to the individual personally;
- ☐ by leaving a copy of the document at the individual's dwelling or usual place of abode with someone of suitable age and discretion who resides there;
- ☐ by delivering a copy of the document to an agent authorized by appointment or by law to receive service of process;
- ☒ by electronic filing notification (PACER); *or*
- ☐ other: courtesy copy by electronic mail to carl@crowell-law.com

Carl D. Crowell, Esq.  
Crowell Law  
943 Liberty Street S.E.  
P.O. Box 923  
Salem, Oregon 97308-0923  
Attorney for Plaintiffs GLACIER FILMS (USA) INC. and GLACIER FILMS 1 LLC

24 June 2016

Date

David H. Madden